

UNITED STATES DISTRICT COURT

Southern DISTRICT OF Texas

JOSH SPRAGUE
V.

ED'S PRECISION MANUFACTURING, LLC

AMENDED EXHIBIT LIST

Case Number: 4:20-cv-2604

PRESIDING JUDGE Lee Rosenthal					PLAINTIFF'S ATTORNEY Clayton D. Craighead / Sara Richey	DEFENDANT'S ATTORNEY Robert Freehill / Chris Johnson
TRIAL DATE (S)					COURT REPORTER	COURTROOM DEPUTY
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
1					Plaintiff's leave request form (EPM 000026)	
2					Plaintiff's pay stubs from working for Defendant (Sprague 0003)	
3					COBRA Checks (Sprague 162-164)	
4					Emails from Jennifer Sprague to Defendant (EPM 00001, EPM 00020)	
5					Documents reflecting Plaintiff's efforts to obtain new employment (Sprague-58, Sprague 65-69)	
6					Text messages sent to / from Plaintiff concerning his employment with Defendant (Sprague 42-50, Sprague 51-52, Sprague 53, Sprague-54-55)	
7					Hi-Tech Paystubs (Sprague-39, Sprague-165)	
8					Disciplinary records for Defendant's employees related to tardiness, leaving early, and/or absenteeism (EPM-24-25, EPM-59-65, EPM-82-83, EPM-191-193)	
9					Time sheets reflecting hours worked by Defendant's employees during COVID (EPM-195-240)	
10					Defendant's Employment Policies (EPM 00005-17)	
11					Written statements from Ramiro Schuur and Jesus Martinez (EPM 000018-19)	
12					Plaintiff's termination paperwork (EPM 000024-25)	
13					Employer Response to Notice of Application for Unemployment Benefits (EPM 000034-35)	
14					Training Record (EPM 00087-90)	
15					Email from Nancy Khuong to Nancy Khuong (EPM 91)	
16					Discovery responses	
17					Pleadings	
18					Penn Mutual Docs (Sprague 218-223)	
19					2020 Ed's Precision's Payroll Summary (EPM 23)	

Plaintiff Joshua Sprague reserves the right to use and/or introduce the following as evidence in this case:

- a) All exhibits entered into the Court's record by Defendant;
- b) All documents produced by the parties, not specifically listed herein in response to written discovery;
- c) All written responses to discovery by any party herein not specifically identified as an Exhibit or potential Exhibit above;
- d) All documents, if any, obtained through the use of an authorization;
- e) All documents, if any, submitted to the Court by affidavit;
- f) All documents, if any, subpoenaed by any party from any third-party such as medical providers, employers, etc.;
- g) All documents and exhibits attached to the transcript of any oral or written deposition, not specifically listed herein; and
- h) Should the need arise, any and all documents not specifically listed herein but exchanged by the parties throughout the discovery phase of this litigation.

Plaintiff Joshua Sprague has made every effort to identify the exhibits likely to be used at trial but reserves the right to use demonstrative exhibits and other public documents as well as rebuttal evidence and witnesses, if necessary.

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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
1					Plaintiff's leave request form (EPM 000026)	
2					Plaintiff's pay stubs from working for Defendant (Sprague-0003)	
3					Correspondence from Cy Fair ISD concerning COVID (Sprague-0004 (including the materials found at the link provided therein), EPM-150-158)	
4					Emails from Jennifer Sprague to Defendant (EPM 00001, EPM 00020)	
5					Documents reflecting Plaintiff's efforts to obtain new employment (Sprague-58, Sprague 65-69)	
6					Text messages sent to / from Plaintiff concerning his employment with Defendant (Sprague 42-50, Sprague 51-52, Sprague 53, Sprague-54-55)	
7					Executive Orders issued concerning COVID including those from Gov. Gregg Abbott and the Honorable Lena Hidalgo and referenced CDC Guidelines (Sprague-0081-161)	
8					Disciplinary records for Defendant's employees related to tardiness, leaving early, and/or absenteeism (EPM-24-25, EPM-59-65, EPM-82-83, EPM-191-193)	
9					Time sheets reflecting hours worked by Defendant's employees during COVID (EPM-195-240)	
10					Defendant's Employment Policies (EPM 00005-17)	
11					Written statements from Ramiro Schuur and Jesus Martinez (EPM 000018-19)	
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Respectfully submitted,

THE CRAIGHEAD LAW FIRM, PLLC

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ATTORNEY-IN-CHARGE FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of June 2021, I electronically served the above document on counsel of record including the following recipient(s):

Robert E. Freehill
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/s/ Clayton D. Craighead
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